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**UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

11 UNITED STATES OF AMERICA, ) Case No. CR 24-570-WLH-16  
12 Plaintiff, ) **EX PARTE APPLICATION FOR**  
13 vs. ) **PREPARATION OF A PRE-PLEA**  
14 CLAIRE HAVILAND, *et al.*, ) **PROBATION REPORT FOR**  
15 Defendants. ) **DEFENDANT CHARISSA**  
16 ) **CHOTARD; DECLARATION OF**  
17 ) **COUNSEL**

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17 TO THE HONORABLE WESLEY L. HSU:

18 *Ex parte* application is made by defendant Charissa Marie Chotard for a pre-plea  
19 report by the Probation Office solely on the issue of her criminal history. This application  
20 is based upon the attached declaration of Richard M. Callahan, Jr., and the files and  
21 records of this case.

22 Dated: November 16, 2024.

Respectfully submitted,

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THE LAW OFFICES OF  
RICHARD M. CALLAHAN, JR.

By:   
RICHARD M. CALLAHAN, JR.  
Attorney for Defendant  
CHARISSA MARIE CHOTARD

## **DECLARATION OF RICHARD M. CALLAHAN, JR.**

I, Richard M. Callahan, Jr., hereby declare:

1. I am counsel of record for defendant Charissa Chotard in the case of *United States v. Claire Haviland, et al.*, CR 24-570-WLH-16. This matter is currently set for trial before this Court on February 24, 2026.

2. To better advise Ms. Chotard in this litigation, I request a court order for the preparation of a pre-plea report by the United States Probation Office, limited to an evaluation of Ms. Chotard's criminal history.

3. On or about November 16, 2024, Assistant United States Attorney Reema El-Amamy advised that she had no objection to this request.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed on November 16, 2024 in Los Angeles County, California.

By: RICHARD M. CALLAHAN, JR.